

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN KARGHER LLP
14 15260 Ventura Blvd., Suite 715
15 Sherman Oaks, California 91403
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 FIDELITY NATIONAL TITLE GROUP, INC., FIDELITY
20 NATIONAL TITLE INSURANCE COMPANY

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Janet Trost, Esq.
24 501 S. Rancho Drive
25 Suite H-56
26 Las Vegas, Nevada 89106

27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

US BANK NATIONAL ASSOCIATION,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:20-CV-01955-KJD-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY IN
SUPPORT OF MOTION TO DISMISS
AND OPPOSE COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT (ECF Nos. 45, 61)**

FIRST REQUEST

COMES NOW defendant Fidelity National Title Insurance Company (“Fidelity”)
(collectively, “Defendants”) and plaintiff U.S. Bank National Association (“U.S. Bank”), by and
through their respective attorneys of record, which hereby agree and stipulate as follows:

1. On May 22, 2023, Fidelity filed its motion to dismiss (ECF No. 45);

2. On July 17, 2023, U.S. Bank filed its opposition to Fidelity's motion (ECF No. 60) and filed a countermotion for partial summary judgment (ECF No. 61);

3. Fidelity requests a two-week extension of its deadline to oppose U.S. Bank's countermotion for partial summary judgment and a four-week extension of its deadline to reply in support of its motion to dismiss, through and including Monday, August 21, 2023 (such that Fidelity's reply and response shall both be due on that date), to afford Fidelity's counsel additional time to review and respond to U.S. Bank's opposition and countermotion;

4. Counsel for U.S. Bank does not oppose the requested extension;

5. This is the first request for an extension made by counsel for Fidelity, which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED that Fidelity's deadline to reply in support of its motion to dismiss and respond to U.S. Bank's countermotion are hereby extended through and including Monday, August 21, 2023.

Dated: July 21, 2023

SINCLAIR BRAUN KARGHER LLP

By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
Attorneys for Defendant
FIDELITY NATIONAL TITLE INSURANCE
COMPANY

Dated: July 21, 2023

WRIGHT FINLAY & ZAK, LLP

By: /s/-Lindsay D. Dragon
LINDSAY D. DRAGON
Attorneys for Plaintiff
U.S. BANK NATIONAL ASSOCIATION

IT IS SO ORDERED.

Dated this 27th of July, 2023.



KENT J. DAWSON
UNITED STATES DISTRICT JUDGE